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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. CR 24-00022-HSG
)	
Plaintiff,)	STIPULATION TO EXCLUDE TIME FROM
)	MARCH 13, 2024 TO MAY 8, 2024
v.)	AND ORDER
)	
EVER ESAU SANCHEZ-MORADEL,)	
)	
Defendant.)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant EVER ESAU SANCHEZ-MORADEL that time be excluded under the Speedy Trial Act from MARCH 13, 2024 through MAY 8, 2024.

At the status conference held on MARCH 13, 2024, the government and counsel for the defendant agreed that time be excluded under the Speedy Trial Act so that defense counsel could continue to prepare, including by engaging in plea discussions with government counsel and reviewing the discovery produced, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from MARCH 13, 2024 through MAY 8, 2024 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial. *See* 18 U.S.C.

§ 3161(h)(7)(A).

The undersigned Assistant United States Attorney certifies that he has obtained approval from counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

Dated: March 20, 2024

ISMAIL J. RAMSEY
United States Attorney

/s/
DANIEL N. KASSABIAN
Assistant United States Attorney

JODI H. LINKER
Federal Public Defender

/s/
SEVERA L. KEITH
Assistant Federal Public Defender
Counsel for Defendant
EVER ESAU SANCHEZ-MORADEL

ORDER


Based upon the facts set forth in the stipulation of the parties, the representations made to the Court on MARCH 13, 2024, and for good cause shown, the Court finds that time is excluded from MARCH 13, 2024 through MAY 8, 2024, and that failing to exclude the time from MARCH 13, 2024 through MAY 8, 2024 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C.

§ 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from MARCH 13, 2024 through MAY 8, 2024 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from MARCH 13, 2024 through MAY 8, 2024 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C.

§ 3161(h).

IT IS SO ORDERED.

Dated: 3/21/2024


HON. HAYWOOD S. GILLIAM, JR.
United States District Judge